

Christopher M. McMonagle, Esq.  
Stern & Eisenberg, PC  
1581 Main Street, Suite 200  
The Shops at Valley Square  
Warrington, PA 18976  
Telephone: (215) 572-8111  
Facsimile: (215) 572-5025

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

|   |   |
|---|---|
| IN RE:<br>SANDRA T. LIGHTFOOT<br>AKA SANDRA T. LIGHTFOOT-HAMIEL<br>DEBTOR | CHAPTER 13<br><br>CASE NUMBER: 13-11383-JKF |
| SHAWN HAMIEL<br>(NON-FILING CO-MORTGAGOR)                                 |   |

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A CHRISTIANA TRUST, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR BROUGHAM FUND I TRUST has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362(d) and §1301 in order to proceed with its rights under non-bankruptcy law with regard to the Property, located at 6001 North Water Street, Philadelphia, PA 19120.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **February 27, 2018**, you or your attorney must do all of the following:

(a) file an answer explaining your position with the Clerk's Office located at:

Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

In Philadelphia:

900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

In Reading:

400 Washington Street  
The Madison Building, Suite 300  
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Christopher M. McMonagle, Esq.  
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1581 Main Street, Suite 200  
The Shops at Valley Square  
Warrington, PA 18976  
Telephone: (215) 572-8111  
Facsimile: (215) 572-5025  
cmcmonagle@sterneisenberg.com

and to the Trustee:

Frederick L. Reigle  
Ch. 13 Trustee  
2901 Saint Lawrence Avenue  
P.O. Box 4010  
Reading, PA 19606

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in this motion.
3. A hearing on the motion is scheduled to be held before the Honorable Jean K. FitzSimon on **March 21, 2018 at 9:30 AM** in Courtroom 3, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse, Philadelphia, PA 19107.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at 215-408-2820 to find out whether the hearing has been canceled because no one filed an answer.

STERN & EISENBERG, PC

By: /s/ Christopher M. McMonagle, Esq.  
Christopher M. McMonagle, Esq.,  
1581 Main Street, Suite 200  
The Shops at Valley Square  
Warrington, PA 18976  
Phone: (215) 572-8111  
Fax: (215) 572-5025  
Bar Number: 316043  
Email: cmcmonagle@sterneisenberg.com

Date: February 13, 2018